PROJECT COYOTE

FOSTERING COEXISTENCE

February 12, 2015

California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090
fgc@fgc.ca.gov

Re: Support for a ban on bobcat trapping in California and prohibitions on trapping and hunting of mammalian carnivores for commercial or recreational purposes

Dear Commissioners,

On behalf of Project Coyote's Science Advisory Board we express our support for a ban on bobcat trapping in California and prohibitions on trapping and hunting of mammalian carnivores (predators) for commercial or recreational purposes.[1]

The most general reason for such prohibition is that wildlife managers and sportsmen alike believe, as a community, that killing an animal without an adequate reason is unjustified and unsportsmanlike.[2] Predators are not trapped or hunted for their meat. They are often trapped and hunted merely for recreation or for their pelts, which are then kept as a trophy or sold on the international fur market. This market merely serves those with a desire to purchase luxury items.

Sociological surveys show that most Americans believe hunting for meat represents an adequate reason to hunt.[3] However, those same studies indicate that only small minorities of Americans believe hunting animals for the purpose of supplementing one's income or to gain a trophy are adequate reasons to hunt.[4] Likewise, research indicates that most

[1] This would include, but is not limited to, fur trapping, bounties, sport and trophy hunting, and killing contests, derbies, tournaments, or drives.
[2] This principle is formally and explicitly acknowledged by the North American Model of Wildlife Conservation.
[3] Duda, M. D., and M. Jones. 2014. The North American Model of Wildlife Conservation: Affirming the role, strength, and relevance of hunting in the 21st century. [URL: http://www.responsivemanagement.com /download/reports/ NAMWC_Public_Opinion_Hunting.pdf]
[4] ibid.

Americans consider the use of foothold traps to be inhumane[5], and "a majority of the [U.S.] population disapproves of trapping to make money…and trapping for recreation or sport." [6] Beyond being widespread, those beliefs are well justified. That is, gaining a trophy and serving a luxury industry are trivial reasons to kill a living creature.[7] These perspectives are reason enough to prohibit killing predators for commercial or recreational purposes.

Furthermore, wildlife professionals understand that wildlife populations are public trust assets.[8] In a judicious democracy all citizens have a stake in the treatment of public trusts. That means, when most citizens have good reason to treat a public trust, such as a predator population, in a particular manner, then the trust should be managed in that way.

What most citizens believe to be adequate and inadequate reasons for killing wildlife is important because participation in hunting has been on the decline for decades, and that decline is worrying to members of the hunting community. Reversing that trend and maintaining the support of the non-hunting community almost certainly requires the hunting community to be sensitive to what most Americans consider to be adequate reasons to kill a living creature.[9]

Some advocates might argue that trapping and hunting predators should be allowed because it is a traditional form of recreation. The shortcoming with this rationale is that "tradition" cannot ever by itself be an adequate justification for any activity. Many traditional activities, once condoned, are now widely acknowledged to be unjustified.[10]

Some proponents might argue that trapping and hunting predators is necessary because without trapping or hunting these species would become overabundant and subsequently reduce the abundance of prey species – prey species that some believe should be managed for maximum abundance for the purpose of maximizing hunter success. A great deal of science indicates that killing predators is not a reliable means of increasing ungulate abundance. The circumstances most likely to result in increased ungulate abundance are also the circumstances most likely to impair important ecosystem benefits and services that predators provide. Even when predators are killed to the point of impairing the ecosystem services, there is still no assurance that ungulate abundance will increase. The

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[5] According to Reiter et al. (1999), 80% of the U.S. public found foothold traps to be inhumane capture devices. Reiter D., Brunson M., Schmidt R.H. 1999 Public attitudes toward wildlife damage management and policy. *Wildlife Society Bulletin* 27, 746-758. This finding was recently replicated by Bruskotter and colleagues (unpublished data).

[6] According Duda and Young (1998) 59% of Americans disapproved of trapping generally. Duda M.D., Young K. (1998) American attitudes toward scientific wildlife management and human use of fish and wildlife: Implications for effective public relations and communications strategies. pp. 589-603. *Transactions of the North American Wildlife and Natural Resources Conference.*

[7] While earning an adequate income is vitally important, fewer than 100 Californians trap bobcat as a means of supplementing their incomes. Trapping predators is unimportant to the economic health of California.

[8] This principle is also formally and explicitly acknowledged by the North American Model of Wildlife Conservation.

[9] This reasoning highlights the imprudence of fear mongers who believe that prohibiting unjustified forms of hunting and trapping is a slippery slope to the prohibition of all forms of hunting.

[10] This includes many forms of sexism and racism.

reason being is that ungulate abundance is frequently limited by factors other than predators – factors such as habitat and climate.

Proponents might also argue that killing predators is an important means for decreasing the loss of livestock to depredation. A great deal of science has been developed on how to effectively manage depredations. Lessons from that science include: In a population of predators, typically only a few individuals are responsible for depredating livestock.[11] For this reason, indiscriminate killing of predators is an ineffective means of reducing depredations because it does not target the offending predator or the time or place where depredation has occurred.[12] Moreover, indiscriminate killing can lead to the disruption of predators' social and foraging ecology in ways that plausibly, and perhaps likely, increase the risk of depredation. Reducing the loss of livestock is a common goal for all stakeholders. The concern is that recreational and commercial killing of predators does not contribute to this goal and may work against it because this kind of killing tends to be indiscriminate with respect to depredating predators.

Some proponents of predator trapping and hunting might highlight that opponents of predator killing are free to refrain from doing so; but being opposed does not justify prohibiting others from doing so. These proponents might further argue for being allowed to hunt and trap predators because – in their view – a sufficiently robust reason to oppose predator killing has not been offered. This laissez faire perspective misconstrues the circumstance. To kill a living creature without an adequate reason violates a fundamental principle of wildlife management and sportsmanship. By that principle particular instances of killing should be prohibited until good reason is offered for why doing so would be justified. To our knowledge, no such reason has been forthcoming. If some purported reason were presented, we would be very interested to evaluate such a reason.

Beyond these points and counterpoints, lies a need to better recognize and celebrate predators' valuable contribution to the health and vitality of our ecosystems. For example, predators serve human interests through rodent control, disease prevention, positive and indirect effects on plant communities, soil fertility, and physical processes (e.g., erosion and stream geomorphology). Trapping and hunting predators is antithetical to those valuable contributions.

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[11] For example, see F. F. Knowlton, E. M. Gese, M. M. Jaeger, Coyote depredation control: An interface between biology and management. *Journal of Range Management* 52, 398-412. (1999).

[12] For examples, see M. M. Conner, M. M. Jaeger, T. J. Weller, D. R. McCullough, Effect of coyote removal on sheep depredation in northern California. *J. Wildl. Manage.* 62, 690-699 (1998); B. N. Sacks, M. M. J. K. M. Blejwas, Relative vulnerability of coyotes to removal methods on a northern California ranch. *J. Wildl. Manage.* **63**, 939-949. (1999); B. N. Sacks, M. M. Jaeger, J. C. C. Neale, D. R. McCullough, Territoriality and breeding status of coyotes relative to sheep predation. *J. Wildl. Manage.* 63, 593-605. (1999).

Thank you for considering these concerns on this important issue. If the Commission were interested to know about any of the claims or rationale in this letter, we would be honored to share that insight with the Commission.

Respectfully submitted,

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